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Attorneys for Defendants
 YOUTUBE, LLC and SUNDAR PICHAI

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

DONALD J. TRUMP et al.,

 Plaintiffs,

 v.

 YOUTUBE, LLC et al.,

 Defendants.

) CASE NO.: 4:21-cv-08009-YGR
)
) **NOTICE OF SETTLEMENT AND**
) **STIPULATION OF DISMISSAL**
) **PURSUANT TO FED R. CIV. P.**
) **41(a)(1)(A)(ii)**
)
) Hon. Yvonne Gonzalez Rogers
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1 The Parties to the above-captioned action (the “Action”), by and through their respective
2 counsel, hereby stipulate and agree as follows:

- 3 1. The Parties hereby agree to settle and dismiss the Action, with prejudice, pursuant to the
4 terms of separate settlement agreements (“Settlement Agreements”) and Fed. R. Civ. P.
5 41(a)(1)(A)(ii).
- 6 2. As set forth in the Settlement Agreements, the terms of which shall be controlling,
7 Alphabet, of which Defendant YouTube is an indirect subsidiary, shall transfer a total of
8 \$24,500,000 (Twenty-Four Million and Five Hundred Thousand U.S. Dollars) to the
9 attorney trust account of Plaintiffs’ counsel of record, John Coale, to be allocated
10 consistent with the terms of the Settlement Agreements, as follows:
 - 11 • A payment of \$22,000,000 (Twenty-Two Million U.S. Dollars) to settle and resolve
12 with Plaintiff Donald J. Trump any and all disputes and claims arising out of or
13 relating to the Action, which he has directed to be contributed, on his behalf, to the
14 Trust for the National Mall, a 501(c)(3) tax-exempt entity dedicated to restoring,
15 preserving, and elevating the National Mall, to support the construction of the
16 White House State Ballroom; and
 - 17 • Payments totaling \$2,500,000 (Two Million and Five Hundred Thousand U.S.
18 Dollars) to settle and resolve with Plaintiffs American Conservative Union,
19 Andrew Baggiani, Austen Fletcher, Maryse Veronica Jean-Louis, Frank Valentine,
20 Kelly Victory, and Naomi Wolf any and all disputes and claims arising out of or
21 relating to the Action, to be distributed among them in accordance with the terms of
22 the Settlement Agreements executed between Defendants and those Plaintiffs.
- 23 3. This Notice of Settlement and Stipulation of Dismissal shall not constitute an admission of
24 liability or fault on the part of the Defendants or their agents, servants, or employees, and
25 is entered into by all Parties for the sole purpose of compromising disputed claims and
26 avoiding the expenses and risks of further litigation.

4. The Parties agree that this Notice of Settlement and Stipulation of Dismissal will not be used as evidence or otherwise in any pending or future civil or administrative action against Defendants or their agents, servants, or employees, or their successors.

5. Execution and filing of this Notice of Settlement and Stipulation of Dismissal shall constitute a dismissal of this action with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

Respectfully submitted,

Dated: September 29, 2025

FERGUSON COHEN, LLP

By: /s/ John Q. Kelly
John Q. Kelly
jqkelly@fercolaw.com

Attorney for Plaintiffs
DONALD J. TRUMP, KELLY VICTORY,
AUSTEN FLETCHER, AMERICAN
CONSERVATIVE UNION, ANDRES
BIAGGIANI, MARYSE VERONICA JEAN-
LOIUS, NAOMI WOLF, AND FRANK
VALENTINE

Dated: September 29, 2025

WILSON SONSINI GOODRICH & ROSATI
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By: /s/ Brian M. Willen
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Attorneys for Defendants
YOUTUBE, LLC AND SUNDAR PICHAI

SIGNATURE ATTESTATION

I, Brian M. Willen, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

/s/ Brian M. Willen